

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

THE VINEYARD COMPLEX, LLC

Case No.

Debtor.

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AFFIDAVIT PURSUANT TO LOCAL RULE 1007-2

STATE OF NEW YORK)
)
COUNTY OF ROCKLAND) SS:

Abraham Hoffman, being duly sworn, affirms and says:

I am the sole and managing member of The Vineyard Complex, LLC, the above captioned Chapter 11 debtor and I make this affidavit pursuant to Local Rule 1007-2.

1. The Debtor operates a four story 176 room building in Johnson City, New York pursuant to a ground lease entered into on January 11, 2008. The genesis of the Debtor's financial difficulties coincided with the Debtor's inability to fill the building with tenants prior to the increase in payments due to the Lender, leaving Debtor cash poor resulting in its inability to make the payments required of it pursuant to its agreements.

2. The case was originally commenced under Chapter 11.

3. No committee was organized prior to the order for relief in this Chapter 11 case.

4. With respect to the holders of the 20 unsecured claims, a list of each of those creditors, along with the names and addresses, as well as indication of whether the claim is contingent, liquidated or partially secured is annexed hereto.

5. With respect to each of the holders of the five largest secured claims, Debtor states that the following may possibly be holders of secured claims:

Morgan 86 Inc.
77 Spruce Street, 3rd Floor
Cedarhurst, NY 11516

6. A summary of the Debtor's assets and liabilities; Debtor's assets which consist essentially of a ground lease with a purchase option is \$7,000,000; liabilities equal approximately \$6,100,000.

7. The Debtor is not publicly held. The Debtor is a one-member limited liability company whose membership interests are owned by Abraham Hoffman whose address is 51 Forest Road, Suite 316-90, Monroe, NY 10950.

8. The Debtor's property is in the possession or custody of a custodian pursuant to the State Court order dated December 16, 2009 which granted the Lender's ex-parte request for an Order appointing a receiver of the property. The receiver is Robert Harkness of Harkness Commercial Realty Group of Johnson City, New York.

9. The Debtor is in the premises under a ground lease for the premises located at 100 Albert Street, Johnson City, New York. The Debtor operates its business from its offices at 51 Forest Road, Suite 316-90, Monroe, NY 10950.

10. The Debtor's substantial assets, including its books and records, are located at the Debtor's business premises at 51 Forest Road, Suite 316-90, Monroe, NY 10950. The Debtor has no assets held outside the territorial limits of the U.S.

11. The Debtor is currently involved in litigation with the Lender, Morgan 86, Inc. with regard to monies owed under certain loan documents. An ex-parte Order

appointing a receiver was signed on December 16, 2009. Additionally, the NYS Dept. of Labor has commenced a proceeding against the Debtor.

12. The Debtor is operated by Abraham Hoffman, who has been the (only) member of the Debtor since its inception.

13. The Debtor intends to continue operating the business following the entry of the order for relief in this bankruptcy case.

(i) The estimated amount of the weekly payroll to employees (exclusive of its members) for the 30 day period following the filing of the Chapter 11 petition is \$0.

(ii) The amount paid and proposed to be paid for services to the Debtor's insiders/members for the 30 day period following the filing of the Chapter 11 petition is \$0.

(iii) Estimated cash receipt for the 30 day period following the filing of the Chapter 11 petition is \$17,000 (provided the possession issue is resolved.)

s/ABRAHAM HOFFMAN

Abraham Hoffman

Sworn to before me this
Day of January 2010

s/ TED MOZES

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AFFIDAVIT PURSUANT TO LOCAL RULE 1007-3

STATE OF NEW YORK)
)
COUNTY OF ROCKLAND) SS:

Abraham Hoffman, being duly sworn, affirms and says:

I am a managing member of All Clean, LLC, the above captioned debtor and I make this affidavit pursuant to Local Rule 1007-3.

1. The Debtor is a one-member limited liability company whose membership interest is owned by Abraham Hoffman whose address is 51 Forest Road, Suite 316-90, Monroe, NY 10950.

s/ ABRAHAM HOFFMAN

Abraham Hoffman

Sworn to before me this
Day of January 2010

s/ TED MOZES